DICKINSON WRIGHT PLLC 1 GABRIEL A. BLUMBERG 2 Nevada Bar No. 12332 Email: gblumberg@dickinson-wright.com 3 8363 West Sunset Road, Suite 200 Las Vegas, Nevada 89113-2210 4 Tel: (702) 550-4400 Fax: (844) 670-6009 5 Attorneys for Defendant 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 Case No.: 2:18-cv-01456-APG-PAL PHIL RAMOS, an individual 9 Plaintiff, 10 **JOINT STIPULATION AND** ٧. [PROPOSED] ORDER TO EXTEND 11 DEADLINE FOR DEFENDANT TO FILE THUNDERBIRD COLLECTION RESPONSE TO COMPLAINT 12 SPECIALISTS, INC., an Arizona Corporation, [First Request] 13 Defendants. 14 15 16 IT IS STIPULATED by and between the parties, through their respective counsel, that 17 Defendant Thunderbird Collection Specialists, Inc. shall have until September 28, 2018, to respond 18 to Plaintiff Phil Ramos's Complaint [ECF No. 1], filed August 7, 2018. 19 This stipulation is made for the purpose of facilitating settlement discussions and to permit 20 the parties time to investigate the facts of Plaintiff's claim, Defendant's defenses, and to continue 21 to engage in discussions concerning resolution of this matter. The stipulation is not made for the 22 purpose of delay. 23 24 25 26 27 28

1	This is the first stipulated request to extend the deadline for Defendant to respond to the	
2	Complaint.	tend the deadline for Defendant to respond to the
	Сопрати.	
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5	DATED this 4th day of September 2018.	
6	ERIK W. FOX	DICKINSON WRIGHT PLLC
7	/a/ Erik W. For with narmingion	11
8	/s/ Erik W. Fox with permission Erik W. Fox Nevada Bar No. 8409	Gabriel A. Blumberg Nevada Bar No. 12332
9	COGBURN LAW OFFICES	8363 West Sunset Rd., Ste. 200
10	2580 St. Rose Parkway, Ste. 330 Henderson, Nevada 89074 Attorneys for Plaintiff	Las Vegas, NV 89119 Attorneys for Defendant
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14	ORDER	
15		IT IS SO ORDERED.
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17		United States Magistrate Judge
18		Dated: September 7, 2018
19		Dated.
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